

May 24, 2023



Consumer Federation of America



National  
Consumer Law  
Center  
*Fighting Together  
for Economic Justice*

The Honorable Pat Fallon  
Chairman  
Subcommittee on Economic Growth,  
Energy Policy, and Regulatory Affairs  
U.S. House Committee on Oversight  
and Government Accountability  
2157 Rayburn House Office Building  
Washington, DC 20515

The Honorable Cori Bush  
Ranking Member  
Subcommittee on Economic Growth,  
Energy Policy, and Regulatory Affairs  
U.S. House Committee on Oversight  
and Government Accountability  
2105 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman Fallon and Ranking Member Bush,

The Consumer Federation of America (CFA) and the National Consumer Law Center (NCLC) are writing in support of the Department of Energy's (DOE) recently proposed standards for cooking products, which include electric and gas stoves. Improving the efficiency of cooking products will save consumers money and reduce greenhouse gas emissions and indoor pollutants — helping households reduce bills while benefiting our climate, the environment, and human health. Due to the demonstrated economic and health benefits, CFA and NCLC strongly support the Department of Energy's proposed standards.

Gas and electric cooking tops have never had to meet any efficiency performance requirements; in effect, some models use far more energy than others to do the same amount of cooking. The Department of Energy's analysis shows that the proposed standards would reduce energy use by about 30% for both gas and electric cooking tops, relative to the least efficient products on the market today. Inefficient cooking products require more energy to operate, and DOE's analysis shows that on average, any increase in purchase cost under the proposed standards would be paid back in electric or gas bill savings well within the life of the product.<sup>[1]</sup> The full proposed rule, which includes updated standards for electric and gas residential stoves and ovens,

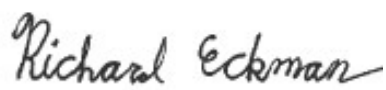
would result in savings of up to \$1.7 billion for U.S. consumers and avert about 22 million metric tons of carbon dioxide emissions over 30 years of sales.

In other words, these standards will not only save consumers money but will help reduce the impacts of climate change, which are felt more acutely in low-income communities. Despite being the most adversely impacted by climate change, low-income consumers have the fewest resources to address the harms that rising temperatures cause, so this rule would go a long way toward protecting these vulnerable households.

Inefficient stoves raise important equity concerns. If DOE fails to adopt strong efficiency standards for stoves, it will leave millions of renters (who are disproportionately low-income compared to the population at large) consigned to having less efficient stoves installed with consequently larger energy bills. What stove a renter has in their home is typically determined by the owner or landlord. Owners of low-income rental properties tend to purchase less-efficient appliances since they usually are not responsible for the energy bills and prefer to limit their capital investments. The proposed efficiency standards will help ensure that owners buy efficient stoves for their rental units, resulting in significant savings for already cash-strapped consumers who are dealing with burdensome energy bills.

The Department of Energy's proposed standards would ensure that all stove models take advantage of proven advances already in use by many stoves today, while simultaneously not limiting consumer choice. Consumers understand this, and it's for that reason [surveys](#) over the past decade show that consumers overwhelmingly want more energy-efficient appliances and strongly support stronger federal standards. The proposed standards are a win-win-win; consumers will save money, breathe less pollutants and cook using the product of their choice.

Sincerely,

A handwritten signature in black ink that reads "Richard Eckman". The signature is written in a cursive, slightly slanted style.

Richard Eckman  
Energy Policy Associate Consumer  
Federation of America

A handwritten signature in black ink, appearing to read "Berneta L. Haynes". The signature is stylized with a large initial "B" and a long horizontal stroke at the end.

Berneta L. Haynes  
Senior Attorney  
National Consumer Law Center

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[1] DOE estimates that the average lifetime of a stove is about 15 years.